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April 14, 2021

## VIA ECF

Honorable Kenneth M. Karas

United States courthouse

300 Quarropas Street

White Plains, New York 10601-4150

Re: Pacchiana v. Savage, S.D.N.Y. Case No. 20-cv-5774-KMK-PED

Your Honor:

This Firm represents plaintiff Miranda Pacchiana in the above-referenced matter. I am writing on behalf of both, this office and defense counsel to advise that we have agreed to pursue mediation to resolve this matter. Therefore, we are requesting a second extension of the discovery deadlines set forth in the Case Management and Scheduling Order filed 11/10/20. The first request was made by letter motion dated February 10, 2021 (Document 22). Your Honor granted that request, in part, by Memo Endorsed on February 10, 2021 (Document 23).

Accordingly, as of February 10, 2021, the discovery deadlines were as follows: all fact discovery by May 11, 2021; all depositions by April 30, 2021; requests to admit are to be served by April 30, 2021 and all expert disclosures by August 30, 2021.

As of the date of this letter motion, we have concluded plaintiff's deposition and we have agreed to pursue mediation. To that end, we have exchanged the names of proposed neutrals for the purpose of choosing an appropriate mediator for the purpose of resolving this case. At present, each of our offices is vetting the mediator proposed by the other and the soonest possible dates available as of the date of this correspondence are May 10 and May 14, 2021. We should have the mediation scheduled by the next conference with Magistrate Davison, currently scheduled on April 19, 2021.

Under the circumstances, we are requesting another sixty (60) day extension of the aforementioned discovery deadlines so that if the mediation is not successful in resolving this matter, we can resume the exchange of the discovery set forth herein. Should Your Honor grant this request, the new discovery deadlines will be as follows: all fact discovery by July 10, 2021; all depositions by June 29, 2021; requests to admit are to be served by June 29, 2021 and all expert disclosures by October 29, 2021.

Should Your Honor require any additional information, we will be available for a telephonic conference at the Court's convenience. Thank you for your time and consideration.

Respectfully submitted,

  
Frances L. Garfinkel